

EXHIBIT 15

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF NEW JERSEY
3 - - -
4

5 IN RE: JOHNSON & :
6 JOHNSON TALCUM POWDER :
7 PRODUCTS MARKETING, :
8 SALES PRACTICES, AND : NO. 16-2738
9 PRODUCTS LIABILITY : (FLW) (LHG)
LITIGATION :
THIS DOCUMENT RELATES :
TO ALL CASES :
9

10 VOLUME IV
11 - - -
12 November 5, 2018
13 - - -
14 Continued videotaped
15 deposition, via zoom and videoconference
16 of JOHN HOPKINS, Ph.D., at Orrick, LLP,
17 107 Cheapside, London, UK, and taken
18 pursuant to notice, and also held at the
19 law offices of Cohen, Placitella & Roth,
20 127 Maple Avenue, Red Bank, New Jersey,
21 beginning at 9:57 a.m. EST, on the above
22 date, before Michelle L. Gray, a
23 Registered Professional Reporter,
24 Certified Shorthand Reporter, Certified
Realtime Reporter, and Notary Public.
20 - - -
21 - - -
22 - - -
23 GOLKOW LITIGATION SERVICES
24 877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

5 BY MR. BICKS:

6 Q. And was one of the entities
7 that tested Johnson & Johnson's talc
8 McCrone Laboratory?

9 A. Yes. McCrone was the
10 leading -- leading test facility in the
11 United States for many, many years.

12 Q. And do you know who wrote
13 the TEM test method that Johnson &
14 Johnson used?

15 A. Yes. Walter McCrone wrote
16 the test method and it was published in a
17 book that he authored.

18 Q. Mm-hmm. And did Johnson &
19 Johnson hire other individuals considered
20 to be at the top of their field in
21 microscopy to test their talc for
22 asbestos?

1 talc.

2 Q. And did that include
3 Dr. Fred Pooley from Cardiff?

4 A. Yes, it did.

5 Q. Did it include Dr. Gordon
6 Brown from Princeton?

7 A. Yes, Dr. Brown was an expert
8 involved.

9 Q. Did it include Walter Burger
10 from MIT?

11 A. Yes, it did. He was another
12 expert involved.

13 Q. Did it also include
14 individuals from the Colorado School of
15 Mines?

16 A. Yes. They -- they
17 contributed their expertise.

18 Q. And did the FDA test Johnson
19 & Johnson's talc over the years?

20 MR. PLACITELLA: Objection.

21 Beyond the scope.

22 THE WITNESS: They did on
23 their own, and other facilities
24 did test talc.

1 BY MR. BICKS:

2 Q. And -- and can you describe
3 what the FDA concluded about whether or
4 not there was asbestos in Johnson &
5 Johnson talc?

6 MR. PLACITELLA: Objection.

7 It's been asked and answered and
8 beyond the scope of my cross.

9 THE WITNESS: They concluded
10 there was no asbestos in Johnson's
11 talc.

12 BY MR. BICKS:

13 Q. And did -- in Plaintiffs'
14 Exhibit 28, did it include all the FDA
15 testing of Johnson & Johnson talc?

16 A. Well, I guess I don't see
17 all the FDA testing reported here.

18 Q. Yeah. Did the National
19 Institute of Occupational Safety and
20 Health, also called NIOSH, also test
21 Johnson & Johnson's talc?

22 A. They did, yes.

23 Q. And do you -- and do you
24 recall what they concluded?

1 A. By -- by all the test
2 methods they -- they used, they concluded
3 there was no asbestos in the samples of
4 talc.

5 Q. And did the Illinois EPA
6 also test Johnson & Johnson's talc?

7 MR. PLACITELLA: Objection.

8 It's all been asked and answered.
9 You're way beyond the scope.

10 I know you don't like the
11 testimony how it went in, but
12 you're not supposed to go back and
13 ask questions you already asked
14 the first time around.

15 MR. BICKS: Please just
16 object to the form, sir.

17 MR. PLACITELLA: Well,
18 object to the --

19 BY MR. BICKS:

20 Q. Dr. Hopkins, did the
21 Illinois EPA test Johnson & Johnson talc?

22 MR. PLACITELLA: Objection.
23 Asked and answered. Beyond the
24 scope.

1 THE COURT REPORTER: I

2 missed the answer.

3 By MR. BICKS:

4 Q. And -- and what did they
5 conclude?

6 A. They concluded there was no
7 asbestos in -- in the talc.

8 Q. Yeah. And one of the
9 exhibits plaintiffs showed you was
10 Exhibit 369, the document about worldwide
11 interest. Do you remember that?

12 A. Yes, I do.

13 Q. And I want you to take a
14 look at that. And I'm going to ask you,
15 is it in the worldwide interest of
16 Johnson & Johnson to use testing methods
17 that scientists conclude are inaccurate?

18 A. No. Any test method has to
19 be accurate and has to have valid
20 scientific information to being accurate.
21 So you're not going to use test method
22 that doesn't have scientific support.

23 Q. And you were asked questions
24 by plaintiffs' counsel about the